

**FILED**

APR 30 2021

Clerk, U.S. District Court  
Texas Eastern

*Bd*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

TAIWAN KING,

§

*Plaintiff,*

§

v.

§

Case No. 2:19-cv-00217-RSP

CARDINAL SERVICES, LLC and  
RAEGAN LEMAIRE

§

§

§

*Defendants.*

**VERDICT FORM**

In answering the following questions and completing this Verdict Form, you are to follow all the instructions I have given you in the Court's Final Jury Instructions. Your answers to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Final Jury Instructions. You should refer to and consider the Final Jury Instructions as you answer the questions in this Verdict Form.

**IT IS VERY IMPORTANT THAT YOU FOLLOW THE  
INSTRUCTIONS PROVIDED IN THIS VERDICT FORM.**

**READ THEM CAREFULLY AND  
ENSURE YOUR VERDICT COMPLIES WITH THEM.**

**Question 1:**

Did the negligence, if any, of those named below proximately cause the occurrence in question?

Answer either "Yes" or "No"

Raegan LeMaire:

Yes

Cardinal Services, LLC:

Yes

Taiwan King:

Yes

*If you answered "YES" as to Raegan LeMaire, Cardinal Services, LLC, or both then proceed to Question 2.*

*If you answered "NO" to both Raegan LeMaire and Cardinal Services, LLC, do NOT answer any other questions leave the remaining questions unanswered and go to the final page of the Verdict Form.*

**Question 2:**

For each person you found caused or contributed to cause the occurrence, find the percentage of responsibility attributable to each:

Raegan LeMaire:	<u>41</u> %
Cardinal Services, LLC	<u>54</u> %
Taiwan King:	<u>5</u> %
Total:	<u>100</u> %

*If you answered more than “50%” as to Taiwan King, then do NOT answer any other questions leave the remaining questions unanswered and go to the final page of this Verdict Form. Otherwise proceed to Question No. 3.*

**Question 3:**

What sum of money, if paid now in cash, would fairly and reasonably compensate Mr. King for his injuries, if any, that resulted from the occurrence in question?

Physical pain suffered in the past:

\$ 20,000 91,000.00

Physical pain that, in reasonable probability, Mr. King will sustain in the future:

\$ 38,000 64,000.00

Loss of earning capacity sustained in the past:

\$ 63,500 90,000.00

Loss of earning capacity that, in reasonable probability, Taiwan King will sustain in the future:

\$ 150,000 176,000.00

Mental anguish sustained in the past:

\$ 140,875 72,875.00

Mental anguish that, in reasonable probability, Mr. King will sustain in the Future:

\$ 1875.00

Disfigurement sustained in the past:

\$ 0

Disfigurement that, in reasonable probability, Mr. King will sustain in the future.

\$ 0

Physical impairment sustained in the past:

\$ 51,875

Physical impairment that, in reasonable probability, Mr. King will sustain in the future.

\$ 163,500

Medical care expenses that, in reasonable probability, Mr. King will incur in the future.

\$ 219,750

**Question 4:**

Do you find by clear and convincing evidence that the harm to Mr. King resulted from gross negligence attributable to Cardinal Services, LLC?

Answer either "Yes" or "No"

Cardinal Services, LLC:

No

*If you answered "YES" as to Cardinal Services, LLC, then proceed to Question No. 5.*

*If you answered "NO" as to Cardinal Services, LLC, then then do NOT answer any other questions leave the remaining questions unanswered and go to the final page of this Verdict Form.*

**Question 5:**

What sum of money, if any, should be assessed against Cardinal Services, LLC and awarded to Mr. King as exemplary damages for the conduct found in response to Question No. 4?

Answer in dollars and cents, if any:

\$ \_\_\_\_\_

Please sign and date this form and notify the Courtroom Security Officer that you have reached a verdict.

Foreperson:

Date: 4-30-21